

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC.

Plaintiff,

v.

SHORE TRANSIT, *et al.*,

Defendants.

Civil Action No. ____-____

PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION

Plaintiff People for the Ethical Treatment of Animals, Inc. (‘‘PETA’’), by and through its attorneys, hereby respectfully requests pursuant to Federal Rule of Civil Procedure 65(a)(1) and Local Rule 105 that the Court issue a preliminary injunction enjoining Defendants from enforcing Shore Transit’s unconstitutional policy of censoring advertisements that Shore Transit deems ‘‘political,’’ ‘‘offensive,’’ ‘‘controversial,’’ ‘‘objectionable,’’ or ‘‘in poor taste,’’ both facially and as applied to PETA, and issue an order requiring Shore Transit to provide advertising space to PETA on equal terms to other advertisers.

In support of its motion, Plaintiff submits the accompanying Memorandum of Law in Support of Its Motion for a Preliminary Injunction; the declaration of Brianna Vazquez, Senior Communications Administrator for PETA with attached exhibits; and the declaration of attorney Robin R. Cockey with attached exhibits.

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Grant this Motion for a Preliminary Injunction;
2. Grant such other and further relief as justice may require.

August 16, 2021

Brian M. Hauss*
American Civil Liberties
Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
T: 212.549.2500
F: 212.549.2654
bhauss@aclu.org

* *pro hac vice* application forthcoming

Respectfully submitted,

/s/
Robin R. Cockey, Federal Bar No. 02657
Cockey, Brennan & Maloney, PC
313 Lemmon Hill Lane
Salisbury, MD 21801
T: 410.546.1750
F: 410.546.1811
rrcesq@cbmlawfirm.com

Counsel for Plaintiff